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December 19, 2011

Via Electronic Filing

Honorable Mary Milloy
United States Magistrate Judge
United States District Court
Southern District of Texas, Houston Division
515 Rusk Avenue
Houston, TX 77002

Re: Rydex, Ltd. v. Ford Motor Co., et al. (Civil Action No. 4:11-cv-00122)

Dear Judge Milloy:

We represent defendant Chrysler Group LLC ("Chrysler") in the above-referenced action. We write pursuant to the request received from Ms. Cindy Jantowski on December 13, 2011 that Chrysler provide the Court with the status of the case as it pertains to Chrysler.

On June 6, 2011, Chrysler filed its Answer to Rydex Ltd.'s ("Rydex") Complaint for Patent Infringement denying infringement and setting forth six affirmative defenses, including invalidity of Rydex's patent. Under the Scheduling Order (D.I. 241) entered in the case, Rydex will serve infringement contentions on December 20, 2011, Chrysler will serve invalidity contentions on February 21, 2012, and claim construction will follow thereafter.

Rydex served its first set of discovery requests on Chrysler on December 9, 2011. Chrysler has not yet served discovery requests. In accordance with the parties' Joint Case Management Plan (D.I. 237), Chrysler and the other defendants are working with Rydex to reach agreement on a proposed Protective Order, as well as an agreement regarding limits on production of electronically stored information. Chrysler has no motions pending before the Court.

Counsel for Chrysler will make themselves available at Your Honor's convenience to address any of these issues.

Respectfully submitted,



Frank C. Cimino, Jr.